

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

<hr/> In re: STRUDEL HOLDINGS LLC and AVR AH LLC, Debtors.¹ <hr/>	§ § § § § § §	Chapter 11 Case No. 23-90757 (CML) (Emergency Relief Requested) (Joint Administration Requested)
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NOTICE OF DESIGNATION AS COMPLEX BANKRUPTCY CASE

On July 27, 2023, the above-captioned debtors and debtors-in-possession (collectively, the “**Debtors**”) filed voluntary petitions for relief under title 11 of the United States Code in the United States Bankruptcy Court for the Southern District of Texas (the “**Court**”). The undersigned proposed counsel believes that these chapter 11 cases qualify as complex cases because:

- X The total liabilities of the Debtors exceed \$10 million.
- There are more than 50 parties-in-interest in these cases.
- Claims against the Debtors are publicly traded.
- Other

Accordingly, the Debtors respectfully request that the Court enter an order, substantially in the form attached hereto, granting the relief requested herein and such other and further relief as may be just and proper.

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: AVR AH LLC (0148) and Strudel Holdings LLC (5426). The Debtors’ service address is: PO Box 4068, Aspen, CO.

Dated: July 27, 2023
Houston, Texas

Respectfully submitted,

/s/ Joshua W. Wolfshohl

PORTER HEDGES LLP

Joshua W. Wolfshohl (TX Bar No. 24038592)

Aaron J. Power (TX Bar No. 24058058)

Michael B. Dearman (TX Bar No. 24116270)

1000 Main St., 36th Floor

Houston, TX 77002

Tel: (713) 226-6000

Fax: (713) 226-6248

jwolfshohl@porterhedges.com

apower@porterhedges.com

mdearman@porterhedges.com

*Proposed Counsel for the Debtors and Debtors in
Possession*

CERTIFICATE OF SERVICE

I certify that on July 27, 2023, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas on those parties registered to receive electronic notices.

/s/ Joshua W. Wolfshohl

Joshua W. Wolfshohl